

Erin Taylor
1614 Sparrow Way
Bensalem, PA 19020

September 20, 2024

Honorable Judge John F Murphy
James A. Byrne U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: Case Number: 2:24-cv-02019 JFM

Dear Judge Murphy,

I am contacting you regarding the documents that I received regarding my Section 1983 Civil Rights Violation complaint that I filed. Per the forms provided by the clerk's office, I have amended my complaint. I have also changed the plaintiff's name from "Jane Doe" to "Erin Taylor". I have also included the names of the defendants, which is a change from "Jane Doe" and "John Doe" in the original complaint.

My amendment has expanded on my initial claim to be more specific regarding each defendants' actions as it pertains to civil rights violations. Initially, it was my understanding to be "brief" and at a later date, I would be able to fully detail the violation(s).

Enclosed in the documents attached to my amended complaint, you will find a more comprehensive explanation of each defendant's role regarding my civil rights being violated.

I thank you in advance for taking the time to allow me to amend my complaint and read what I have compiled for you.

Best regards,

A handwritten signature in black ink, appearing to read 'Erin Taylor', with a stylized flourish at the end.

Erin Taylor

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ERIN TAYLOR

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

MICHAEL MILLER

ERICA PARHAM

JERRY LAZAROFF

BROWN & BROWN INSURANCE

PAUL PUGIELLI - SENIOR VICE PRESIDENT

24-2019

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Erin Taylor</u>
	Street Address	<u>1614 SPARROW WAY</u>
	County, City	<u>BUCKS, BENSALLEN</u>
	State & Zip Code	<u>PA 19020</u>
	Telephone Number	<u>(215) 968-8822</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name MICHAEL MILLER
 Street Address 12 E. BALTIMORE AVENUE
 County, City DELAWARE, LAWSBORNE
 State & Zip Code PA 19050

Defendant No. 2 Name ERICA PARHAM
 Street Address 201 WEST FRONT STREET
 County, City DELAWARE, MEDIA
 State & Zip Code PA 19063

Defendant No. 3 Name JERRY LAZAROFF
 Street Address 1029 N PROVIDENCE ROAD
 County, City DELAWARE, MEDIA
 State & Zip Code PA 19063

Defendant No. 4 Name BROWN & BROWN INSURANCE, PAUL PUGIELI
 Street Address 3001 EMBICK BLVD, SUITE 100
 County, City NORTHAMPTON, BETHLEHEM
 State & Zip Code PA 18020

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? VIOLATION OF 42 U.S.C. 1983 AND VIOLATION OF OATH OF OFFICE BY PUBLIC SERVANT(S).

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? _____

LANSDOWNE, PA

B. What date and approximate time did the events giving rise to your claim(s) occur? _____

5/18/22 AT 9:00 A.M.

C. Facts: ON MAY 18, 2022, I TURNED MYSELF INTO
LANSDOWNE BOROUGH POLICE (STATION) W/ MY ATTORNEY.
THIS WAS THE DAY OF MY ARREST.

What
happened
to you?

Who did
what?

PLEASE SEE ATTACHED SHEETS EACH DEFENDANTS
ACTIONS HAVE BEEN OUTLINE INDIVIDUALLY.

Was
anyone
else
involved?

PLEASE SEE ATTACHED SHEETS ALL PARTIES INVOLVED
W/ VIOLATION HAS BEEN OUTLINE INDIVIDUALLY.

Who else
saw what
happened?

PLEASE SEE ATTACHED SHEETS

Who Did What?- MICHAEL MILLER

I, Erin Taylor, am filing a Section 1983 lawsuit, against Officer (Off.) Michael Miller, in which I will be stating factual claims in which a ***violation of one of my secured rights by the Constitution and laws of the United States, breached by the actions*** of Off. Michael Miller acted ***under the color of state law & violated his oath of office***. Additionally, Off. Michael Miller continued a series of acts in which he was not only unprofessional but displayed ***multiple acts of police misconduct***.

Off. Michael Miller violated my Fourth Amendment right by conducting an illegal search (and seizure), as well, purposely misleading a judge and withheld necessary information to obtain a search warrant. Off. Michael Miller subsequently received an invalid warrant. Based on the information that was omitted in the search warrant by Off. Michael Miller in addition to the ***real facts Off. Michael Miller lacked probable cause*** for the warrant that he illegally acquired.

Off. Michael Miller conducted a search warrant and came to my mother's home in the early morning on March 18, 2022. (just two days after being one of four officers promoted to Sgt. at Lansdowne Police Dept and after being assigned to "Criminal Investigations"; according to Off. ***Michael Miller***, he ***stated that I was his "first case" and that he would be making an "example" out of me***).

I will first be explaining how the ***search warrant that Off. Michael Miller obtained was in fact invalid***. As stated previously, the ***warrant did not contain material information in which the judge would have needed to issue a fair judgment as to sign the warrant or not, as well as lacked probable cause. There was no concrete evidence, but instead Off. Michael Miller's mere suspicion (which lacked the high level of standard required for probable cause). There weren't enough sufficient facts to lead to me as a suspect nor that any items connected to any alleged crime would be found in my mother's home. Off. Michael Miller knew this, which is why he chose to omit key, material information, when originally composing his search warrant affidavit.***

Initially, I had offered to take a lie detector test for Off. Michael Miller to establish my innocence and to prove that what I was saying to him was true. Off. Michael Miller declined my offer and said that he "didn't care" about that. This only further solidified all his biased statements towards me and only showed that he had no interest in fully investigating the alleged attack because he was focused on me. When questioned by the defense on May 24, 2022, during a preliminary hearing, Off. Michael Miller stated that he did not offer Mr. Boyd or Ms. McCall a polygraph test. He also stated that he did not check their phones to see if they in fact had made phone calls, sent text messages, or sent threats to me. He decided to not investigate either witness; even though he had already stated that he didn't fully believe Mr. Boyd to begin with and felt as though he was hiding information due to the fact that Mr. Boyd kept shutting down when presented with questions (in general) or follow-up questions.

Invalid Search Warrant

Regarding “omissions” & “intentional reckless disregard for the truth” Off. Michael Miller showed his disrespect for the court by demonstrating both actions.

The basis for the initial search warrant not only contained information from an unreliable source, but also material information was both withheld while misleading a judge for Off. Michael Miller to obtain such a warrant.

Unlike probable cause, which is needed to obtain a search warrant, Off. Michael Miller had a “hunch” (one of the words that Off. Michael Miller expressed to me) that I may have committed a crime which wasn’t enough to reach the high standard of probable cause, as it pertains to getting a search warrant. According to Off. Michael Miller’s own statements made in the presence of others stated that he didn’t fully believe Mr. Boyd (my ex and the alleged victim’s current boyfriend) and felt that he was leaving information out when he briefly questioned him. Off. Michael Miller stated that he asked Mr. Boyd if there was anyone that was upset with him. Mr. Boyd stated “yes” and mentioned my name, including friends. Mr. Boyd, according to Off. Michael Miller said that he wanted to give him a “heads up” and let him (Off. Michael Miller) know that both my friends and I might tell him that he was abusive, if asked.

Off. Michael Miller stated that he asked Mr. Boyd why I or others would say he was abusive, Mr. Boyd shut down and didn’t answer, but instead changed the subject. Off. Michael Miller stated that he also asked Mr. Boyd to go into further detail regarding the break-up between myself and Mr. Boyd and again, Mr. Boyd shut down and said that he “didn’t want to talk about it”. Off. Miller said that he had read emails between Mr. Boyd and me, and it reminded him of all the “Netflix and YouTube” videos that he watches “all the time”. I told Off. Michael Miller that it was “weird” of him to even bring up Netflix and YouTube as it pertained to what was currently going on (during a search).

He (Off. Michael Miller) was aware that I had asked Mr. Boyd to leave me alone and move on, in addition, to other relationship issues, that we had experienced while being in an abusive relationship with Mr. Boyd for over 10 years.

Off. Michael Miller failed to do any further investigation, however allowed for Mr. Boyd, someone who not only proved he had lied about being abusive, but with cheating as well, cited Mr. Boyd as a “reliable source”. ***By Off. Michael Miller stating that he didn’t fully believe Mr. Boyd when questioning him, however presenting Mr. Boyd as a “credible source” with “reliable information” was a misrepresentation of the truth, facts, as well as a false narrative.***

Off. Michael Miller failed to inform the judge that he not only had questions about what Mr. Boyd was telling him, but he also failed to mention to the judge that the person he listed as a “witness”, also had a reason to lie and had a personal issue with me, the person he was alleging of committing a crime.

Off. Michael Miller was also aware, through information that I provided to him, that Mr. Boyd had lied about his communication to me as well. He (Off. Michael Miller) stated that while he did find out that his belief of Mr. Boyd lying had confirmed his suspicions about him, since he had already found a “suspect” in me, he was going to “overlook”, Mr. Boyd’s lies. Off. Michael Miller again reminded me that I was his first major case and was going to “make an example” out of me, which he repeated multiple times during the time I was in communication with Off. Michael Miller. (from the date of the search until the time when I turned myself in; May 10, 2022). Off. Michael Miller also stated several times he was going

to take me down "no matter what it takes". He also said "I always get my man", which I thought was an odd statement to make being that I am a female.

Off. Michael Miller wrote in his affidavit for a search warrant that Mr. Boyd had told him that he received threats, etc from myself, however Off. Michael Miller misled the judge into believing that these supposed threats were viewed by him personally, which was not the case. Off. Michael Miller not only admitted to not seeing any threats, but he also wrote that he never checked Mr. Boyd or the alleged victim, Ms. McCall (Mr. Boyd's current girlfriend) phones to see if they had received threats on their phones. Additionally, according to Off. Michael Miller, Mr. Boyd had told him that he received these threats for years (while admitting still being in a relationship with me) and that he (Mr. Boyd) had not been in communication with me for at least five or six months. None of the statements that Mr. Boyd alleged happened contained any current incidents or situations. By both Mr. Boyd and Off. Michael Miller's own testimony, any alleged threats, though never shown or seen, were either from years ago (again, while still admitting to being in a relationship with me) or at least five or six months prior.

Off. Miller also omitted the factual and material information that no members of Mr. Boyd's family had been interviewed, no children of Ms. McCall to validate any claims that were made. (Off. Michael Miller had named a relative of Mr. Boyd's and sons of Ms. McCall, in his affidavit, but never spoke with them). Off. Michael Miller also failed to inform the judge that despite claims that both Mr. Boyd and Ms. McCall made of threats they supposedly received; none of these "threats" had been shown or viewed by Off. Michael Miller, nor had any interaction or communication taken place between the alleged victim, Ms. McCall, and myself. The only way there had been any comments made were through Mr. Boyd, who told "both sides" that they were being threatened on both sides in order to keep his double life and lies a secret.

However, I had made 3 police reports regarding Mr. Boyd, Ms. McCall, and Ms. Pollard (Mr. Boyd's sister), Off. Michael Miller also failed to check any of their phones, call logs, etc. to determine if they had been harassing me. Being that I was the only one who could provide proof of my harassment and threats against my life and family members lives, Off. Michael Miller said that he "didn't want to hear it" and stated that he "didn't care" about the report I made. A member of the BPD (Bensalem Police Dept) stated that I in fact had made 3 reports, Off. Michael Miller repeated that he "didn't care" about anything I had to say, which contradicts what he wrote in his probable cause affidavit. In his probable cause affidavit, Off. Michael Miller stated that I refused to show him evidence of any calls, but again, he lied because he had already stated in the presence of others that he didn't want to hear anything I had to say.

Additionally, Off. Michael Miller withheld the fact that Ms. McCall (the alleged victim) had not only referred to me as a "problem" for her because Mr. Boyd continued to be in a relationship with me when she wanted to be with him, but more importantly that she changed her story several times when speaking with different officers, including Off. Michael Miller, himself, and even changed a date in which she stated she was approached by her alleged attacker. Off. Michael Miller also withheld the fact that Ms. McCall changed the clothing that he alleged attacker was wearing and at times was not sure if her alleged attacker had been a male or female. Off. Michael Miller was not only reckless but had a disregard for the truth when he failed to inform the judge that he alleged victim had inconsistencies within her story regarding her alleged attack.

Moreover, Off. Michael Miller also misled the judge when he mentioned there was a video of the alleged attack. Off. Michael Miller lied when he both wrote that in his affidavit and when he swore under oath

regarding information from that same affidavit to obtain the (invalid) search warrant. Upon receiving video discovery after requesting, it for more than two years, it was proven that no attack was caught on video nor anything that the alleged victim stated previously was caught on video surveillance. In fact, video surveillance contradicted what the alleged victim stated in one incident and about any attack being caught on video, that was untrue, as well. Off. Michael Miller lied, again, when stating that such evidence existed, when in fact, it did not.

Not only had no attack been shown on video, but the "alleged attacker" was fully covered and neither their face nor the gender was able to be revealed or recognizable for video discovery that was provided, again, after two years of requesting all video discovery, and full discovery, overall, which still has not been received. There are no images or videos that show the actual face or any other identifying factors as it pertains to the alleged attacker and me. Off. Michael Miller stated in his affidavit that Mr. Boyd had identified me in the video by a "gait", but did not inform the judge that there was no video of showing the alleged attackers face nor how Mr. Boyd could identify a "gait", more specifically a person "running", in which he didn't provide any examples or evidence of Mr. Boyd and I ever being in each other's presence where we would see each other run.

Additionally, Off. Michael Miller withheld facts regarding searching for me within the city on the night of the alleged attack. During a recorded police interrogation on March 18, 2022, in which I volunteered to speak with Off. Michael Miller and Sgt. Steven Clark both stated that they could not locate me anywhere on any video cameras, this included street cameras and any public transportation, as well. This is both crucial and much needed information that the judge needed when being able to fairly assess if a search warrant could be signed and executed. It was suggested that since I was not shown that on any video surveillance that perhaps I may have been "dropped off" and Off. Michael Miller stated that even if I "didn't do it" then I knew someone who did. Off. Michael Miller stated either way that I was "his"; which showed he already had a fixation and biases towards me and had no interests in truly investigating the case.

While Off. Michael Miller withheld the fact that he searched all cameras (any neighbors cameras, cameras near/outside any stores, street/road camera, subways, buses, public transportation; if I had any metro card; which Off. Michael Miller concluded that I did not have a metro card or anything similar) and came up empty, he ironically listed on his probable cause affidavit, which contained lie(s) and misinformation; Off. Michael Miller purposely omitted the fact that the person he listed as a suspect, me, was not found on any cctv or surveillance cameras, but by his own admission, could not be found using any form of transportation, to carry out any alleged crime.

Off. Michael Miller strategically wrote his affidavit knowing that material information was missing, omitted facts, and knowing lied when crafting his affidavit and filing an application for a search warrant. These omissions and falsehoods demonstrated by Off. Michael Miller has proven to be deliberate to fraudulently obtain a search warrant. All these factual claims make the search warrant invalid and should never have been issued if all the material information was supplied & if no lies or misleading of the judge had occurred due to the actions of Off. Michael Miller.

Off. Michael Miller attempted to use the (invalid) search warrant to validate his "hunch" since he lacked probable cause. A search warrant can't be used as an investigative tool; especially where no probable cause exists.

Section 1983 Fourth Amendment Right Violation-Illegal Search and Seizure

During the search conducted at my mother's home on March 18, 2022, Off. Michael Miller violated my U.S. Constitutional Fourth Amendment right by doing an illegal search and not only seizing items that were not listed on the search warrant, but also took items that were not in plain sight, as well.

Under the direction of Off. Michael Miller (he stated that the BPD was there under "his orders") officers of the BPD (Bensalem Police Department) looked for items believed to be in connection with an alleged crime. Much of the search was done by Off. Michael Miller threw things around and down of the floor, followed by Det. Stephen Clark, of the BDP. The other officers stood around, while one officer took inventory in the kitchen, standing over the stove, using the open space on the stove to act as a table to write things down: Off. Michael Miller told him to keep track of the evidence log/sheet by writing down whatever he and/or Det. Steven Clark handed to him. ***Only the officers from the BPD were wearing body cameras. Off. Michael Miller did not have nor was he wearing a body camera.***

Off. Michael Miller had been throwing items; clothing on the floor and on a long bench furniture. Despite myself and my mother telling Off. Miller that he was taking clothing that didn't belong to me and even clothing that contradicted what he said he was looking for (ex: all black clothing, but was taking colorful scarves, gloves, hoodies, etc.) and said, "didn't care". It was also explained to Off. Michael Miller and the other police officers that some items that they were going through were specially packed for the homeless, which had been collected every week. Off. Michael Miller conducted himself in the way he expressed how he felt which was he "didn't care".

Upon removing several coats and jackets, Off. Michael Miller came across a black backpack belonging to me. He then proceeds to open the backpack and go through it. This was done in the presence of other officers, including Det. Steven Clark and my mother. As Off. Michael Miller proceeds to go through it, he attempts to antagonize me, taunts me, and fails to bait me into his assertion that he "found a detailed letter"; which he later changes from a letter to "post it notes" that looked like it had to do with the alleged crime. When Off. Michael Miller doesn't get the reaction expected, he gets upset, but then proceeds to ask me to sign a consent form for him to search the bag, in which my mother and I point out that he already searched the bag and that I would not be signing any consent form or waiver.

Off. Michael Miller then proceeded to tell the officer in the kitchen to write down the black backpack as evidence. It was also pointed out that the black backpack was not only listed on the warrant, but that it was not in plain view, and that the search of the backpack was illegal. Off. Michael Miller said that he was going to say it was in "plain view" though others had seen him go through jackets, coats, and other clothing to even reach the backpack that was underneath on the floor. Off. Michael Miller illegally searched my backpack and seized it, along with other items in the home that had been underneath other items, including clothing as well. Among other items that weren't listed on the warrant, Off. Michael Miller confiscated my new phone (that I purchased due to receiving threatening phone calls from my ex, Mr. Boyd, and his friends/family; I changed my phone number), my wallet, my bank card, and my driver's license. These items not only weren't listed on the warrant, but did not contain any information connected to any crime. Off. Michael Miller would later state that he took those items only to make me "upset" and that he did it "because I can do what I want", in reference to him being a police officer.

During the recorded police interrogation on March 18, 2022, in which I volunteered to have a conversation with Off. Michael Miller and Det. Stephen Clark, Off. Michael Miller referred to items, including notebooks and other written works. Later during a testimony given by Off. Michael Miller during a Preliminary Hearing, on May 24, 2022, while Off. Michael Miller did not provide any video surveillance, nor did he provide the actual photos of any post it notes he claimed to have found, Off. Michael Miller did testify to items that he saw in my backpack.

Off. Michael Miller would later contradict his testimony and commit perjury by stating in the summer of 2024 (in the months between June and July of 2024) that he in fact never searched the backpack and only "unzippered the small part" of the backpack where he found the supposed post-it notes. He would tell this false narrative to the current ADA/Commonwealth assigned to the case when confronted about discovery & questions relating to the post its and backpack. (This case has been going on for more than two years and has exchanged hands in both the Commonwealth's office, as well as defense counsel). It was conveyed to me in July' 2024, that Off. Michael Miller and the Commonwealth had planned to get a search warrant for the backpack, after more than two years, before the start of the trial.

The issue with this, Off. Michael Miller has already violated Section 1983, by illegally searching the backpack more than two years prior on March 18, 2022. Through his own admission during the recorded police interrogation, Off. Michael Miller already mentioned items that were in my backpack. Additionally, Off. Michael Miller also testified on May 24, 2024, as to what he saw in my backpack; the backpack the stated he never went through nor opened.

Lastly, bodycam footage worn by BPD shows Off. Michael Miller going through my backpack, which contradicts any statements that he made to the Commonwealth, or any future statements that could be made on the contrary concerning the illegal search of my backpack.

Furthermore, asserting my factual claim that Off. Michael Miller illegally searched my backpack, Off. Michael Miller was still asking me throughout the time that he had in his own personal possession from the time the search was conducted on March 18, 2024, to when in his own words "forced to return" my belongings by the DA's office; my wallet (in which he stole papers from); my driver's license, and my bank card, and new phone on March 29, 2024. Off. Michael Miller had also returned a white-lined notebook pad that had been inside my backpack. He stated that he gave it back because he already made copies of the phone numbers and other information listed on the different pages of the notebook, which I pointed out was illegal. Off. Michael Miller laughed.

Throughout March 18, 2024, and March 29, 2024, Off. Michael Miller had continued to ask for me to sign a consent form/waiver for the search of my backpack when I called for the return of the items that he took illegally and weren't' on the search warrant. Each time I told him "No". On March 19, 2024, I called Off. Michael Miller on his cell phone and asked for the return of my wallet, backpack, driver's license, bank card, and new phone. Off. Michael Miller informed me that he was working outside the station/office and that he was off the following day, March 20, 2024, and would go through my items because he still had some of the evidence in his car; all evidence should have been turned into the station on March 18, 2024, but wasn't.

Because Off. Michael Miller had threatened to arrest me several times during the search, informed me that he had already told Mr. Boyd and Ms. McCall that he would be arresting me, and stated several times during the police interrogation that he would be arresting me, I retained an attorney. During the

time of March 19, 2022, and March 29, 2022, I had enlisted the help of my attorney and Det. Steven Clark to contact Off. Michael Miller for the return of my belongings. The attorney that I retained had called Off. Michael Miller at least five times that I was aware of, but Off. Michael Miller never returned his call as it pertained to the return of my items. I came to the Bensalem Police Dept and left messages for Det. Steven Clark to find out about any updates from Off. Michael Miller, but I was told that either he didn't return his calls back (yet, at the time) or that Off. Michael Miller said he was coming to the Bensalem Police Station, but would not show up. I was familiar with this kind of action by Off. Michael Miller because he stated on more than one occasion that he would bring my items but would not show up.

Each time Off. Michael Miller would say that to get my backpack back I would need to sign a consent form and to get my new phone back, I had to show proof that it belonged to me and that I paid for it. I told Off. Michael Miller that I had to take my new phone back within a specific amount of time because I was having issues with the new phone and that if it was past the designated time I would either have to keep the phone and pay for an entirely new phone, but Off. Michael Miller purposely kept my phone past the time, which he admitted to on May 10, 2022, in which I had turned myself into the Lansdowne Police Department.

On March 29, 2024, after speaking with Off. Michael Miller earlier in the day and sending him a text message later on the same day, Off. Michael Miller stated that he would come to my mother's home and only return some belongings. I told him "No" and to meet me at the Bensalem Police Station. For some reason Off. Michael Miller was adamant about not wanting to meet at the police station. After some back and forth, I told him what my mother stated, which was she didn't feel comfortable with him coming to my mother's home, especially so late at night and she felt safer for both she and I to meet him at the police station. Off. Michael Miller said he would only meet outside the police station and to either "take it or leave it" (regarding his offer to meet) if I wanted to get my items back. Since I figured that the police station should have cameras, I met with him (along with my mother).

Off. Michael Miller had only returned my wallet (with papers missing), my driver's license, and bank card. He asked for me to sign papers stating that I had received those items. When I asked about my backpack and phone, he reiterated that I needed to sign a consent form for the backpack and that he would return it back to me in "a few days" and in order to get my phone, I needed to show proof that I paid for it. I showed proof of payment for the phone and asked why he returned the phone so late after I told him about the deadline, but he only laughed, ignored the question and told me to sign the paper regarding the return of my phone.

He said he would grab the consent form, assuming that I would sign for the backpack, and I told him I wasn't signing the form and that he had already searched for the backpack illegally. He laughed and said he will just say it was in "plain view" and get a warrant. He said he "figured" I wouldn't consent and stated that he already had a warrant typed up and would "make a call" to have it signed by April 1, 2024; when he returned to work. He stated that he would also contact me April 1, 2024, as well. Off. Michael Miller said that he had "friends" in the DA's office and that it wouldn't be a problem for him to get a search warrant and I shrugged my shoulders and told him "That's fine". Off. Michael Miller never got a search warrant for the backpack, nor did he call me on April 1, 2024.

To recap the Section 1983, Fourth Amendment, Illegal Search & Seizure Violation:

- 1) Off. Michael Miller conducted a search of my mother's home on March 18, 2024 in which he not only took items that didn't belong to me, but also items that were not listed on the (invalid) search warrant.
- 2) One of those items, a black backpack, was not listed on the warrant neither was it in "plain view"; the black backpack was on the floor underneath/at the bottom of a pile of jackets, coats, hoodies, and other clothing.
- 3) Off. Michael Miller asked in the presence of other officers & my mother for me to sign a consent form to search my backpack, which I declined. He stated that he would then say it was in "plain view"; which was a lie.
- 4) Off. Michael Miller illegally searched the backpack while attempting to bait me into a reaction by taunting me. Det. Stephen Clark was standing next to him, while another officer stood at the wall by the steps, and mother and I were near the couch. Another officer stood inside the kitchen and another in the hallway. There was another officer standing outside.
- 5) Off. Michael Miller lied and said he found a "detailed letter" outlining the alleged crime, but later changed his statement and said that he found various "post it" notes with writing on them.
- 6) During a recorded police interrogation, Off. Michael Miller made reference to items that he stated was in my backpack, such as school writings, short stories, and various writing materials, including a white notebook (legal size) that he had listed as evidence for the backpack; that he would later return to me on March 29, 2022, outside of the Bensalem Police Station.
- 7) From March 19, 2022, to March 29, 2022, Off. Michael Miller, when contacting him to return my items, Off. Michael Miller had asked several times for me to sign a consent form for my backpack; each time I said "No".
- 8) On March 29, 2022, Off. Michael Miller had returned some of my items (which should never have been taken, weren't on the warrant, and had no connection to any crime), but not my backpack. However, Off. Michael Miller returned the white legal notebook pad that had phone numbers and other person information listed on the various pages. Off. Michael Miller stated that he was only giving back the notebook because he had already made copies of the information, which was illegal. He asked again for me to sign a consent form/waiver, but once again I declined. Off. Michael Miller stated that he already had a warrant typed up and through "friends" in the DA'S office he would have the warrant signed by April 1, 2022, when he returned to work. He also said that on that same day he would call me. He never filed an application for the backpack, nor did he call me back on April 1, 2022.
- 9) On May 24, 2022, during a preliminary hearing, Off. Michael Miller testified to items that he said he viewed in my backpack while going through/searching it.
- 10) During late June/early July of 2024, before both ADA (Denk) and defense counsel, Ms. Page went on both paternity and maternity leave, when confronted about actual copies of the "post it" notes and an illegal search and seizure issue, Off. Michael Miller stated to the Commonwealth that he had never searched the backpack.
- 11) Off. Michael Miller not only committed perjury, which in itself is a crime, but contradicted his own statements that he made on both March 18, 2022 & May 24, 2022. His lie/perjury also contradicted bodycam footage of Off. Michael Miller that shows that he indeed did open and search through the backpack; again, an item that was neither in plain view nor was it on the search warrant.
- 12) Off. Michael Miller falsely arrested me knowing there was lack of probable cause to begin with. He used his lies and power as an officer to have others help him with the malicious prosecution of me. His malicious arrest was due to having a personal issue with me and was in return a retaliatory act by using the legal system to further carry out his agenda. Moreover, Off. Michael

Miller tampered with evidence while falsifying testimony and affidavits in court in order to obtain warrants.

- 13) Off. Michael Miller not only violated my Fourth Amendment Constitutional Right, but violated Article I, Section 8 of the Pennsylvania Constitution.
- 14) Through police misconduct and lies offered by Off. Michael Miller fully engaged in the violation of my Fourth Amendment Constitutional Rights, by acting under the color of law, in addition to violation his "oath of office".

1983 Civil Rights Violation (Conspiracy) Erica Parham, Director of Delaware County's Pretrial Bail Unit

I have included Erica Parham, Director of Delaware County's Pretrial Bail Unit. I contacted Ms. Parham and left several messages for her asking to discuss an issue regarding one of her employees and wishing to have her contact information regarding a complaint I wished to file. I did not hear back from Ms. Parham, so I decided to send her an email, since my calls seemed to be ignored.

Ms. Parham stated that she needed to first know the matter before releasing that information. I constructed a letter and attached it to an email addressed to her.

I explained to Ms. Parham the improper actions of employee "Sherri", detailing some of her actions (including knowingly receiving false information while still conspiring and pursuing a \$1,000,000.00 bail recommendation), but Ms. Parham stated that she would not provide the employee's name despite me providing the "necessary" details at her request in which she inferred specific information was "needed" in order to release that information to me.

Ms. Parham had seemingly gone back on her "word" or the statement she had made to me via email, but instead Ms. Parham said she was the bail interviewer/ "Sherri" "fell under her supervision and again, would not be releasing her name to me.

Knowing that I wished to file a complaint, Ms. Parham not only failed to address the issue, but failed to take the complaint or have a discussion with me, as well. By failing to investigate my charge against her employee, Ms. Parham neglected her duties as a supervisor. Dismissing my claims, which included mental and emotional stress and intentional infliction of pain caused by her employee, while choosing to ignore the matter, Ms. Parham became complicit with both the actions of her employee "Sherri" and Off. Michael Miller, which makes her legally responsible as well due to being the supervisor/employer of the bail interviewer/" Sherri".

Under the doctrine "respondeat superior", Ms. Parham makes her liable and responsible for her employee's behavior. In her own words via email, she stated that "bail interviewers fall under my supervision", she also referred to the employees in her office as "her staff". As a "Supervisor" and "Director" (of Delaware County's Pretrial Bail Unit", she has been given the actions to hire, fire, investigate, etc. her employees. Being as though "Sherri", was acting within the scope of her job when the misconduct and intentional infliction of both emotional and mental stress occurred towards me. Both "Sherri" and Ms. Parham were neglectful in performing their duties.

Ms. Parham has the term "Esq." listed behind her name, which in terms refers to her title as an attorney, as well. Ms. Parham disregarded the (PA) "Rules of Professional Conduct" as it pertains to a legal profession, as an attorney/lawyer. Within the "Rules of Professional Conduct" it states that as a public citizen attorneys/lawyers have a "special responsibility for the quality of justice". (Rules of Professional Conduct, (1)). (Please see numbers 1-18 under the PA Rules of Professional Conduct", which outlines some of the duties and responsibilities of an attorney/lawyer in and outside of the courtroom)

1983 Civil Rights Violation Co-Conspirer, "Sherri", Bail Interviewer (Erica Parham refuses to release employee's name)

On May 10, 2022, after turning myself in with counsel, at the request of Michael Miller, for that specific date (my birthday), during my bail hearing an employee referred to as "Sherri", conspired with Off. Michael Miller to violate and deprive me of my 1983 federal civil rights.

Off. Michael Miller stood in the hallway, which is only a few feet away from the holding cell I was placed in (the entire holding cell and presumably desks of the officers is all in one space and very small) and told another officer that he had already talked to "Sherri" and prepared her for "the show" and they both laughed. Because the officer was standing sideways, I could only see a side profile, which appeared to be younger than Off. Michael Miller, a little shorter in height, smaller in weight and his hair appeared to be a "dirty blonde" color (which was short/cut low).

I had no idea who "Sherri" was nor what "show" he was talking about, but soon found out that "Sherri" would be my bail interviewer, and the "show" would be my bail hearing.

Off. Michael Miller was not even supposed to sit in on my bail hearing as discussed with my prior counsel, however Off. Michael Miller lied and attended the bail hearing after speaking to my counsel (at the time). I told Off. Michael Miller that he wasn't allowed to attend the hearing and that my counsel had assured me that he had this conversation with him. Off. Michael Miller confirmed the conversation but said that he could "do whatever" he wanted to do because he was now a Sgt. and that I was now in "his house".

During my bail hearing, I was asked series of questions, in which the following had been determined:

- (1) Had never been in trouble with the law
- (2) Turned myself in with an attorney
- (3) Had ties to the community
- (4) Was not a flight risk
- (5) No history of violence

During the interview, as Off. Michael Miller sat next to me, "Sherri" had asked if I had ever been in a mental institution, which I replied "No". She said "What? Never?", as if she knew my answer would have been "Yes" initially. I repeated my answer and said "No".

"Sherri" looked at Off. Michael Miller and said, "You told me she had been institutionalized earlier". Before she could say anything else, he told her to ask the next question and motioned with his hand to continue. "Sherri" next asked me if I had any history or mental illness, etc. I answered, "No". Again, this time she seemed more irritated and directed the conversation to Off. Michael Miller and stated, "You said she had mental issues".

This was insulting for two reasons. Number one for Off. Michael Miller to make up lies about me and tell them to someone else and painting a false narrative about my mental stability and my character and two, to be spoken about, as if I wasn't there and in the same room. This was both hurtful and condescending.

Off. Michael Miller told "Sherri" to "forget" about what he said and to just finish up the questions, which she followed his instructions. After, the bail hearing concluded, Off. Michael Miller walked me back to the holding cell, which was only a few steps away from the very small room that we had been in within

the holding cell/officers' space (desks). He left out and told Sgt "Big Jim", as I heard him be referred to (later found out his name is James McCaughan) that he was going to call "Sherri" and see "how high" he could get my bail.

I later found out that "Sherri" had recommended that my bail be \$1,000,000.00, which was excessive. My defense counsel argued not only that it was excessive, but also presented the facts listed above as well, and didn't warrant such a high bail. Judge Lang agreed and gave me a \$50,000.00 bail instead of the \$1,000,000.00.

However, Sgt. James McCaughan seemed empathetic towards me. He initially asked me if I knew that my bail had originally been one million dollars, while processing me. I answered, "Yes". He stated that it was "crazy" and he had never heard of a bail being that high, followed by "none that I can recall". During my processing, he realized that I was being held on the same day as my birthday. He became very apologetic and said "That's really messed up. I would never do that to anyone". I responded that it was a "gift" from his friend, Off. Michael Miller. He apologized again, which I told him "Thank you", but he wasn't the one that did it. Sgt. James McCaughan stated that despite what I was going through he still hoped that I had a chance to enjoy my birthday. He kept shaking his head and used an expletive in describing how "messed up" it was to be in jail on my birthday.

I did make my attorney aware of the conversation that Off. Michael Miller and "Sherri" had prior to my bail hearing, during my bail hearing, and after my bail hearing. My attorney stated that their misconduct would be addressed before or during trial.

"Sherri" was aware of the information that she received about me from Off. Michael Miller was not true, but still conspired with him to keep me unlawfully detained and imprisoned. "Sherri" and Off. Michael Miller had already confirmed that they talked prior to my bail interview and the lies that Off. Michael Miller was exposed during the bail interview, followed by another phone call after the bail interview.

Both "Sherri" and Off. Michael Miller's conspiracy was inferred by their actions and statements. "Sherri" and Off. Michael Miller conspired to deprive me of my constitutional rights in the hopes of keeping me (falsely) imprisoned. Neither the pending charges nor the facts uncovered by "Sherri" during my bail interview qualified for a bail of \$1,000,000.00.

My extremely high bail seemed to be the talk and joke at the Lansdowne Borough Police Station. I could hear the officers in the hallway discussing how they "never knew anyone's bail to be a million dollars" and laughing about it with Off. Michael Miller.

Because Off. Michael Miller was upset regarding Judge Lang's bail hearing decision, Off. Michael Miller left and did not come back. Sgt. James McCaughan looked for him all throughout the building because both he and Off. Michael Miller was supposed to transport me together to enter me into the system and to do my fingerprints. Off. Michael Miller said an expletive when he came back into the room and hit the desk with his hand before leaving the police station. Upon leaving, he turned to me and said "I'm still going to get you. This isn't over". I just nodded my head to him.

Off. Michael Miller also disrespected Judge Lang and called him out of his name because he didn't agree with him and because Judge Lang lowered my bail, despite Off. Michael Miller lying to him in the hopes of having gps monitor placed on me. (This is fully detailed under the "Misconduct" section of this amendment, which will list Off. Michael Miller's misconduct, illegal activities, and treatment of me)

To note, though Off. Michael Miller had never returned my initial attorney's calls and requests for the return of my items, after Off. Michael Miller was confronted via written communication by me in April 2022, about his misconduct, including illegally taking and searching my backpack, which had not been in plain view, my family and I were sure that he would be applying for an arrest warrant, since most of his actions had been detailed when confronting him.

Off. Michael Miller emailed me and asked for my attorney's number, knowing that he already had the information since my attorney had called him several times already. I gave him the information again. Off. Michael Miller contacted my attorney (at the time) and told him that he would be arresting me and requested that I either turn myself in on May 10, 2022, or that he would be coming to my mother's house to arrest me. My attorney stated that he would call me to inform me and that he would contact Off. Michael Miller again, when he was with me/I was at his office.

With myself and my mother in my attorney's office, he informed Off. Michael Miller, that both my mother and I was with him on the call via speaker phone. Off. Michael Miller reiterated that he wanted me on "May 10th" in which my attorney replied, "You do know that's her birthday, right?" Off. Michael Miller stated "Yes, but I don't care". My attorney tried to negotiate another day and said that I wasn't a flight risk, especially since I had been cooperative and chosen not to travel due to his initial threats of being arrested. My attorney suggested "May 11th" with an attorney present for self-surrendering. Off. Michael Miller said "No, I want her on the 10th!". Off. Michael Miller also stated that he would either be asking for a very high bail or no bail at all.

My attorney had suggested that I retain another attorney (familiar with that area and courthouse) and who was familiar with the police departments in that area; especially because of how Off. Michael Miller presented himself (which was vindictive and biased). I took his advice and retained another attorney from that area. My attorney was unable to reach Off. Michael Miller to set a different date, so I had no choice but to surrender on May 10, 2022, my birthday.

Off. Michael Miller had already presented his agenda which was to have me turn myself in or arrest me on a specific date, May 10, 2022, as well as secure a high bail or no bail for me. Because of the actions demonstrated by "Sherri" and Off. Michael Miller, I affirm that both violated my civil rights and committed "civil conspiracy" while acting under the color of law; Off. Michael Miller, as a police officer and "Sherri", employee of the state as a bail interviewer.

1983 Civil Rights Violation-Conspiracy & False Claims/False Document/False Affidavit-Jerry M. Lazaroff

On June 6, 2022, I received a phone call from Mr. Lazaroff, regarding a psychological evaluation, scheduled by the Commonwealth, at the request of Off. Michael Miller. I was told prior by Off. Michael Miller that he would be requesting an evaluation along with a high or no bail previously. My attorney stated that the evaluation would take around an hour and that I would receive a phone call to go over things.

The date had to be changed on Mr. Lazaroff's end, but I received a phone call from a woman named "Debbie" that said she was from Mr. Lazaroff's office. Due to scheduling conflict Debbie stated that she would reschedule my evaluation for June 6, 2022, at 9:15 a.m. She stated that it would be random

questions and that it would take about an hour, but sometimes it lasted about “an hour and fifteen minutes” so to make sure I set aside at least two hours, in case Mr. Lazaroff was running “a little behind”.

Upon receiving my phone call, Mr. Lazaroff introduced himself and why he was calling. Mr. Lazaroff followed up by stating “I’m basically who the Commonwealth calls. I pretty much work for the state”, which immediately put me on notice with Mr. Lazaroff’s agenda, especially since he describes himself as an employee for the Commonwealth/DA’s office.

Dr. Lazaroff said by law he had to inform me that the call was being recorded. I said I was okay with that. I asked Mr. Lazaroff if I could receive a copy of the recording and evaluation, and he said “Yes” to the recording but that I would have to sign a consent form for it, which wasn’t explained. Regarding the evaluation, Mr. Lazaroff said that my attorney would need to request it from Off. Michael Miller. I asked why him, and he said that that’s who he had been in communication with.

None of it made any sense, but I saw early on before we fully began talking that this evaluation was orchestrated by Off. Michael Miller, especially because it didn’t make sense for Mr. Lazaroff to speak to me and mention Off. Michael Miller instead of the ADA assigned to the case.

Mr. Lazaroff and I only spoke for less than 14 minutes, which was less than ¼ of the time stated by my attorney and his own office. Mr. Lazaroff mentioned that he would be contacting Off. Michael Miller after speaking with me. When I asked why he was speaking to Off. Michael Miller instead of the actual ADA, Mr. Lazaroff started to stutter and rushed me off the phone, concluding by hanging up the phone.

I told my attorney about what happened, as well as my mother, who was in the other room. Both were surprised by the amount of time that we spent on the phone. When the evaluation was ready, my attorney sent it to me. We went over it and discussed several lies and acts of perjury that Mr. Lazaroff committed when submitting his documents. My attorney said that we would address Mr. Lazaroff’s actions and request the recording some time prior to the start of the trial.

It is my assertion that Mr. Lazaroff conspired with Off. Michael Miller because he stated that he had been in contact with Off. Michael Miller (who requested the evaluation) and would be speaking with him, instead of the ADA. Mr. Lazaroff lied about several things in his reports, which I will outline below. Mr. Lazaroff not only falsified documents but supplied a false affidavit/ evaluation as it pertains to me. Mr. Lazaroff perjured himself with the statements that he made in my evaluation.

The following statements Mr. Lazaroff made are false:

- stated that I told him I “occasionally smoked marijuana” years ago. I never made this statement.
- parents separated “several years ago”. I told him that my parents only separated two years ago, but still very much in each other’s lives and talked every week, as well as saw each other every week.
- “dropped out of school due to migraines”. I stated that I had a lot of migraines which led to having other physical and health issues.

The following statements Mr. Lazaroff omitted from report:

-I spoke with him about the abuse (physical, emotional, and verbal) that I had dealt with when I was in a relationship with my ex.

-I expressed to him that I felt I was being victimized again by my ex due to me stating that I no longer wanted to be with him and that he was using the court system to get back at me.

-I spoke about receiving harassing and threatening phone calls from both my ex's girlfriend and his sister. I told Mr. Lazaroff that they even admitted to me about my ex giving them my previous phone number. (I had to change my phone number due to the threats I was receiving) The phone calls consisted of threats against me and my family. I also informed him that I had made several police reports. He did not include any of this in the report.

-I expressed being happy about finally being free from my ex and his abuse.

-I expressed being in a better place without my ex being in my life (which he omitted from the report)

- "She claimed that a Psychological evaluation was ordered because her ex-boyfriend alleged that she is unstable". I told Mr. Lazaroff that the Off. Michael Miller also made several negative statements about me and stated that he was going to order an evaluation. He omitted that statement from the report.

-Mr. Lazaroff stated that he would contact Off. Michael Miller and let him know that he "did not see a reason as to why the evaluation was ordered in the first place", he did "not find anything wrong" with me, and that he did "not believe" that I needed to be on any medication. He also wished me the best of luck going forward and stated he was "sorry" that I was going through the current situation.

This was all before I started to question why he kept talking to Off. Michael Miller instead the ADA, in which he rushed me off of the phone and hung up.

The following statements Mr. Lazaroff wrote that was misleading:

- "and it was probably one of them who did it" (referring to another woman my ex may be cheating with). I also stated that I did not know who committed the act against my ex's girlfriend as well as stating that they both had enemies from the past and that I could not say for certain who did it. (Mr. Lazaroff did not include information in his report)

-cited an affidavit stating that substance found on shoes (which were not confirmed to be mine) and the victim's jacket "matched". The lab report stated it could not say for sure if both substances were the same and "could contain" the same chemical, which is inconclusive. The shoes were not found to even belong to me and were part of a pile for the homeless clothing drive. Mr. Lazaroff failed to list what the document said in its entirety.

-Reported that I did not drink or do drugs, but suggested marijuana. I did confirm that I did not drink or do drugs, however the comment he made about marijuana and "occasionally" smoked it previous was something Mr. Lazaroff wrote on his own since the topic of marijuana never came up. There was never any mention of marijuana and something that Mr. Lazaroff simply made up.

-Mr. Lazaroff stated that I "didn't express any indignation" about the crime I was charged with. I was only told by my attorney to answer the questions that I was asked truthfully and that was all. I only

made comments about being charged with a crime because Mr. Lazaroff claimed to have "no knowledge" of what I was being charged with nor did he have any "paperwork" on me. This was a lie because he had already talked to Off. Michael Miller.

I was not supposed to volunteer any of that information. However, it appears that Mr. Lazaroff had an expectation of how I was "supposed to react", which shows his bias regarding the evaluation and my responses especially since he made a statement twice implying that I did not show any anger or expressed being upset as to any of the alleged crimes.

"takes Flexeril" due to a MVA from 12/20. He asked if I was prescribed medication, and I told him Flexeril and other pain medication. (not that it was something I was taking daily, weekly, or monthly)

-Mr. Lazaroff referred to my ex's girlfriend as "her victim"; showed his bias by assuming and asserting that I am guilty rather than what I am accused of doing. The inconsistencies in Ms. McCall's (the alleged victim) statements were never mentioned.

False Diagnosis with no merit or reasoning for it:

I was told initially that the evaluation would take an hour or a little longer, but that they generally last an hour. I spoke with Mr. Lazaroff for less than fourteen minutes. During that time, he stated that he "had no information or paperwork" on me and asked why the evaluation was ordered. I answered him as best as I could, however he chose to prepare a misleading and false report instead.

Based off my initial conversation with Mr. Lazaroff and the statements he made to me vs. the report he provided Mr. Lazaroff not only lied, but also tailored his report to accommodate the Commonwealth; especially Off. Michael Miller, in which he was hired to conduct the evaluation. Mr. Lazaroff admitting falsified documents with the intent to deceive both Judge Williams and the court.

Mr. Lazaroff diagnosed me with "Adjustment with disturbance of conduct". Even in his own report there is no evidence to conclude that I have the disorder. I did not express to him that I was "stressed" or any other negative emotion in addition to the report stating that I had no criminal history. The "textbook" definition of this disorder contradicts even Mr. Lazaroff's own words in the report.

Moreover, Mr. Lazaroff stated that if I were to "plead Guilty" or were convicted that he would suggest the completion of "Anger Management training". How is it possible to suggest "Anger Management" when Mr. Lazaroff made the following statements:

- I was "cooperative" during the assessment
- I "did not show any indignation" regarding the charges or situation
- (-I expressed being in a better place without my ex being in my life, which he omitted from the report)
- Implied that I did not show any anger or show that I was upset during the evaluation
- I have no criminal history

Additional Notes:

In the past Mr. Lazaroff was publicly reprimanded by the State Board of Psychology for violations involving record keeping and omission of facts. Mr. Lazaroff's license was also suspended for a period and was ordered to pay a fine of \$1,500. Furthermore, Mr. Lazaroff was ordered to receive mandatory

training. An agreement was reached between Mr. Lazaroff and the State Board of Psychology to avoid additional legal ramifications due to Mr. Lazaroff's actions.

Even my ex, Mr. Boyd had made several statements referring to me as being "allegoric" to smoke, not like smoke (in general), and glad that we both weren't smokers. I have been with my medical practice for over 20 years, not once has any drugs of any kind ever showed up in my blood work.

No drug testing for employment or even pre-screening drug testing for employment, has ever shown any positive results for drugs.

No one can testify to ever seeing me smoke anything of any kind before so to even state marijuana use, is beyond a "reach", but an outright lie.

In conclusion, I have provided the factual claims as to why I state that Mr. Lazaroff conspired with Off. Michael Miller to deprive me of my constitutional rights, but also conspired to tarnish my image with the judge and the Commonwealth. Mr. Lazaroff also provided the government with a false document, which contained lies and statements that never made.

Lastly, I reached out to Mr. Lazaroff twice regarding receiving a copy of the audio recording of our short conversation/evaluation, but Mr. Lazaroff never responded. On January 13, 2023, and March 8, 2024, I sent letters to Mr. Lazaroff requesting the supposed audio recording. Mr. Lazaroff never responded to either letter. There also seems to be no copy of the audio recording in the Commonwealth's file, as well. Mr. Lazaroff either lied about the recording or his purposely withholding it because he knows that he lied on the document he supplied to the government. Either way, no copy of the recording has been received by either party.

Brown & Brown Insurance-Lansdowne City and Lansdowne Borough Police Department Insurer
(Insurance Carrier/Insurance Company; Paul Pugielli-Senior Vice President

I have included Brown & Brown Insurance Company as part of the lawsuit because they insure the city of Lansdowne, Lansdowne Borough Police Department, and Off. Michael Miller, who is the main subject/defendant (one of four defendants) listed in the Section 1983 Civil Rights Lawsuit.

POLICE MISCONDUCT & ILLEGAL ACTIVITIES: OFF. MICHAEL MILLER

- 1) **March 18, 2022**-Off. Michael Miller entered my mother's home to conduct a search, however from the start of the search he was verbally abusive for no reason. He yelled at me, he cursed at me, though I had not done anything to him. (On May 24, 2022, Off. Michael Miller testified under oath that I had been "cooperative" with him there was no reason for him to have ever been verbally abusive to me)
- 2) **March 18, 2022**-Off. Michael Miller stated in the presence of others that he "didn't care" about my police report(s). He had to be corrected by an officer from the BPD in which he corrected Off. Michael Miller and said that I had 3 reports. Off. Michael Miller said he still "didn't care". He told me not to talk to him about my reports, despite me having proof on my phone of calls (which he later erases all, but one) and took the advice of the police officers that told me to keep a journal of all the calls, statements made to me, including threats, and any voices that I recognized. I had those things, as well. Off. Michael Miller dismissed all of it. He lied in his "probable cause" affidavit in which he states I "refused to show" him evidence. Again, Off. Michael Miller committed perjury and admitted a document that contained lie(s) in it and submitted it to the court. (to have signed)
- 3) **March 18, 2022**-Off. Michael Miller illegally searched and seized items not listed on the warrant. This would include a black backpack (which was not in plain view, but under a pile of clothing. Off. Michael Miller illegally searches the backpack (which he later lied to the Commonwealth about in June/July 2024); bodycam video worn by BPD showed the opposite of what Off. Michael Miller stated, evidence of perjury. Off. Michael Miller also took other items not in plain view items removed from purses/bags, "love card" from my ex to me, etc.
- 4) **March 18, 2022**-Off. Michael Miller took my wallet, driver's license, bank card, and new phone that I had purchased due to having to get a new phone number because I had been receiving threats from my ex, his new girlfriend (alleged victim), and my ex's sister. None of these items were listed on the (invalid) search warrant nor did it point to or connect to any alleged crime. Off. Michael Miller ignored calls from the (initial) attorney to return the items. Off. Michael Miller would tell either myself or Det. Steven Clark that he would bring the items, but then would not show up or change his mind (on the same day)
- 5) **March 18, 2022**-Off. Michael Miller, during a recorded police interrogation, stated that even though he couldn't see the "alleged attackers" face that he "knew" it was me. Both he and Det. Steven Clark stated that they were unable to "find" me on any surveillance and suggested I was either "dropped off" or had someone allegedly attack my ex's girlfriend. Prior to walking through the door leading to an interrogation, Off. Michael Miller stopped me and asked if I had my brother's gun on me. I told him "No". (My brother had let officers know that he had a permit for his gun and was willing to provide the permit to them during the search). Off. Michael Miller said to me "It's okay if you carry your brother's gun around. It's legal, you know". I looked as if something was wrong with him and replied "No, it's not legal and again, No I don't have my brother's gun on me. Don't ask me that question again".
- 6) **March 18, 2022**-During my recorded interrogation, Off. Michael Miller tried to get me to change a specific date to the date of the alleged crime. He told me that I wasn't where I said I was and suggested I change the date to the date when the alleged crime had taken place. I said "No". He then told me repeatedly that he was going to arrest me and that I should "just confess now". He harassed me, tried to intimidate me, and coerce me into a confession, by threats of arrests.
- 7) **March 19, 2022**-I called Michael Miller on his cell phone (using a relative's phone) and asked for him to bring my items back. He stated that he needed me to sign a consent form for the backpack, which I declined. I also told that the previous day, he asked the same thing, in which I

said "No" and reminded him that he had already searched the backpack. Off. Michael Miller stated that he was working "out of the office" and would check later, since he was off the next day & that he would call me. Off. Michael Miller stated that some of my items from the search were still in his car. This brings the issue of "Chain of Custody" because Off. Michael Miller executed the search warrant early in the morning. There was no reason why any (some, all, etc.) items were still in his personal vehicle. Off. Michael Miller also never called the next day like he said he would.

- 8) **Between March 21, 2022-March 29, 2022**-I contacted Off. Michael Miller for the return of my items. Both my attorney and Det. Steven Clark contacted him, as well. Between those times Off. Michael Miller continued to threaten me with arrest, ask me to sign a consent form for my backpack, and tried to question me, though I already had an attorney.
- 9) **Between March 18, 2022-March 23, 2022**-Off. Michael Miller went through my backpack and informed my ex, Mr. Boyd that I had planned on filing a PFA against him due to the paperwork being partially filled out in my backpack. On March 23, 2022- I was served with a temporary PFA. On May 10, 2022, Off. Michael Miller admitted to telling my ex about the papers (for a restraining order) he found in my backpack. He also noted the emails from counselors (domestic abuse) that he removed. I told him they were emails so I didn't care if he threw those out. I had copies and that regardless I could always go back to my emails. Off. Michael Miller should have never removed anything from my backpack.
- 10) **March 29, 2022**-Off. Michael Miller instructed Det. Steven Clark to tell me NOT to turn in my gun permit. Det. Clark was confused and didn't understand. I waited inside the Bensalem Police Station on a bench waiting for Det. Steven Clark and Off. Michael Miller to finish talking via phone to hear whether I was to turn in my gun permit. When Det. Clark came back inside, he told me that Off. Michael Miller told him to keep my gun permit and not turn it in. Det. Steven Clark scratched his head and said "I don't understand it, but that's what he said. Usually, people have to turn in their permits". Later that day, officers from the Sheriff's office in Media, PA stated that I needed to turn myself in. I was told that usually they arrest people for not turning it in, but that they would give me a break. I explained the conversation and gave them Det. Steven Clark's information to validate my story. They said they "understood" and "sometimes see this kind of thing". I was told that Off. Michael Miller should have known that I had to turn in my gun permit and that he was probably trying to get me into trouble, which I agreed. Though Off. Michael Miller initially lied about the number of years he had been an officer, regardless of whether he should have known that I needed to turn in my gun permit. Off. Michael Miller was hoping that I would get arrested; especially since that's what I was told that's what the Sheriff's office would do and normal protocol.
- 11) **March 29, 2022**- I called Off. Michael Miller after speaking with him earlier that morning. He stated that he would bring my items down because the DA's office told him that he had to return my items. It was getting late, so I sent Off. Michael Miller a text message. He later called me and said that and insisted on coming to my mother's home. I told him that my mother didn't want him coming to her home and that she didn't feel safe with him coming to the home. I suggested Bensalem Police Station. I didn't understand why he didn't want to meet inside. Off. Michael Miller said that he was only willing to meet outside in the parking lot and that I could "take it or leave it" referring to his offer. Since I figured at least one camera should be outside, I agreed. Off. Michael Miller was still trying to get me to sign a consent form for my backpack, which I declined. Off. Michael Miller had me sign release forms for my wallet, driver's license, and bankcard. I didn't sign anything for the white notebook, that was in the illegal search on March 18, 2022. He stated that he had already made photocopies of all the pages within the notebook. Again, another illegal act committed by Off. Michael Miller. Off. Michael Miller made me show

him proof that my new phone belonged to me, which I showed him the receipt for. I signed a form for my phone. Because I declined signing a consent form for my backpack, Off. Michael Miller said that he already had a warrant typed up the bag and that he had "friends" in the DA's office, and he wouldn't have an issue getting it signed. He stated that he would be off, but that he should have the warrant signed by April 1, 2022, and that he would call me on that date. I never received a call from Off. Michael Miller and he never applied for a warrant for that backpack on or by that date.

- 12) **March 29, 2022**-Upon later returning to my mother's home, I checked my wallet and noticed that some papers had been removed from there. I checked my phone and saw that the apps on my phones had been moved around. One app had been deleted from the main page. I had my voicemails changed over, which contained a lot of the calls, but Off. Michael Miller had deleted them, with the exception of one. One of the emails referred to Off. Michael Miller as a "friend of the family" by my ex's sister. She also stated that "Mike's going to arrest you" followed by an expletive, laughed, and hung up the phone.
- 13) **May 10, 2022**-At the request of the Off. Michael Miller and the threat of arrest, I turned myself in with my attorney to the Lansdowne Police Department. Off. Michael Miller requested specially "May 10th", which he knew was my birthday.
- 14) **May 10, 2022**- Off. Michael Miller conspired with "Sherri" a bail interview to deprive me of my rights and falsely imprison me by violating my Fourth Amendment Constitutional Right. He conspired with "Sherri" to recommend a \$1,000,000.00 bail. Upon it being lowered by Judge Lang, he insulted Judge Lang in a phone call to Ms. McCall (alleged victim).
- 15) **May 10, 2022**- Off. Michael Miller lied to Judge Lang during my bail hearing by stating that the alleged victim was "scared" to leave her home and had "not been anywhere" since she was released from the hospital. Not only was this proven to be true through investigation by others, but the "alleged victim" posted outings herself on social media. This was also confirmed in a phone call to the "alleged victim" and Off. Michael Miller on May 10, 2022, when he contacted her regarding the outcome of the bail hearing in my presence. Off. Michael Miller knowingly lied to Judge Lang in order to have him place gps monitoring on me, however Judge Lang disagreed with him. Off. Michael Miller tried to push the issue, but this seemingly irritated Judge Lang. Judge Lang raised his voice and told Off. Michael Miller that he would not be imposing any monitoring on me and didn't see a need for it. He also made it clear that he if fact was the judge and told Off. Michael Miller to in his words "drop the issue". In a phone call to Ms. McCall (the "alleged victim"), Off. Michael Miller referred to Judge Lang as an "idiot" and referred to him as "stupid". While I could not hear what Ms. McCall was saying, Off. Michael Miller's words were clear because he was speaking loudly and he wasn't too far from the holding cell. He said to Ms. McCall "I tried to keep her (referring to me). I even told the judge that you were scared to leave your home because of her". There was a pause, assuming Ms. McCall was speaking because then Off. Michael Miller stated "Yeah, I know you've been out the house. I just told him that so that he would put a gps on her. That judge is an idiot and he's stupid for ruling in her favor". I can't say for sure what Ms. McCall said on the other end, but afterwards Off. Michael Miller told her he would keep her posted. He told another officer that had walked in to grab paperwork off of the short rectangular desk that had two chairs by it, that he "needed some air". That officer didn't seem to know what he was talking about because he simply came in, grabbed some papers and left. I was left to sit in the holding cell and mini office by myself. Occasionally, Sgt. James McCaughan came in and checked on me to see if I was okay and if I needed anything such as water, etc. until it was time to take me to Upper Darby's Police Station to get finger-printed and processed.

- 16) **May 10, 2022**-I confronted Off. Michael Miller about knowing that he erased the voicemails in my (new) phone. He laughed, but didn't deny doing so. His smirk and laugh bothered me, so I informed him that he "missed one" and told him that at least one voicemail was still on my phone. He stopped laughing. He began to taunt me and make threats to me "just in case" I decided to file a complaint against him. Off. Michael Miller made sure to inform that that if I did decide to file a complaint about him the following would happen.
- (1) No one would believe me because in his words "They love me here" (referring to the other police officers. "You're a criminal. No one is going to take your word over mine" and laughed. I replied and told Off. Michael Miller that I wasn't a criminal and that God sees everything. He asked, "Is that a threat?". I said "No, it's a fact".
 - (2) Off. Michael Miller kept taunting me saying that he couldn't wait to get me processed. He said, "I told you I was going to arrest you and I did". I admit that I replied sarcastically and stated, "I actually turned myself in so technically you didn't arrest me". This made him upset, and he told me that once I was "in the system" that he could "make anything happen".
 - (3) Off. Michael Miller stated that he would harass my family and friends for the "fun of it". I told him that he might want to rethink that idea especially since a lot of my family and friends either had law backgrounds, were officers, and/or knew officers. I also stated that none of my family likes "bullies", which is what I called Off. Michael Miller when speaking with him, and that he can't treat us how he normally treated people. I told him that we would fight back. In that moment he shook his head and called me "stuck up". I told him that he didn't know the meaning of that phrase otherwise he would not have used it. I also then asked him once again to stop talking to me. He said "Yeah, yeah, yeah, I know, or you'll tell your attorney" and briefly walked out the small room/holding area.
- 17) **May 10, 2022**-Off. Michael Miller confirmed he held my wallet and other belongings on purpose. When another Sgt. James McCaughan stated that someone by the nickname of "Man Man" his wallet back, Off. Michael Miller laughed. He turned to me and said "I love when they want your stuff back". I asked him if that was "his thing" and he replied "I did that to you didn't I. You still don't get it? I'm a Sgt. Look where you're at and look where I'm at. I can do what I want".
- 18) **May 10, 2022**- Off. Michael Miller admitted that I "angered" him because I "didn't break". I wasn't fully sure what he meant by it initially, but the more he talked, I got an idea. He asked me "Why aren't you crying?", "Why aren't you yelling?" and other similar questions. I repeated the same answer that I had told him previously when asking for the return of my items, which was, we both knew that my ex stated that he would make my life "a living hell" once I decided to completely leave him for good. This wasn't a surprise. It was only another manipulation tactic that my ex was using to get back at me. I told Off. Michael Miller, "Sorry, if you thought you were going to see my cry, yell, or talk back to you the way you talk to me, then you're going to be disappointed. That's not going to happen". Off. Michael Miller told me "You think you're better than everybody". I stated "Never said that. Never acted that way. That's your thinking". Off. Michael Miller brought up Netflix and YouTube again and said that he sees "my kind" and "women like me all the time" on Netflix and YouTube. I laughed.
- 19) **May 10, 2022**-o be clear, I was only asking Off. Michael Miller to make a phone call to my mother regarding bail. Off. Michael Miller denied that request initially. It was only when I pointed out

the camera near the clock is when he turned around and realized the camera was there, as if he had forgotten, then allowed me to make the call with him sitting next to me. He interrupted me by talking on the phone to my mother when providing details of where to go to make a payment and how much bail would be. I had to remind Off. Michael Miller that in addition to initially denying my request to make one call to my mother, that I would also be telling my attorney about his harassment regarding the phone call and his intimidation, sitting very close to me during my bail interview. It was then, and only then, that Off. Michael Miller stopped talking and sat in the chair next to me. By that time, I was hanging up the phone with my mother.

- 20) **May 24, 2022**-Off. Michael Miller committed perjury while providing testimony at my preliminary hearing. Off. Michael Miller purposely misled the judge and courtroom regarding video surveillance and statements made by both my ex and the alleged victim. He didn't provide a true and accurate evidence regarding a lab report. The video "evidence" and physical "post it" notes were purposely withheld from Judge Keith Williams. Video evidence never showed me or even a clear image of the alleged attacker and to date, including the various ADA's that have been assigned to the case, have never physically seen the "post it" notes. The defense has never seen them either. They have been requested by both parties (which were in the possession of Off. Michael Miller) and more than two years later, only statements that Off. Michael Miller **alleges** were on the post it notes and not anything physical, which raised the authenticity of them. Due to what Off. Michael Miller **alleges** were on certain post it notes, I'm take a stance that Off. Michael Miller tampered with evidence and fabricated certain post it notes. Off. Michael Miller describes himself as a "handwriting expert" so it's very much possible for him to attempt to copy my handwriting. Knowing most of what he states were on the post it notes, that were in the backpack that he illegally searched and seized, I affirm that I didn't make nor write those statements.

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

I SUSTAINED EMOTIONAL, Psychological DISTRESS AND MENTAL ANGUISH. I LOSS MY JOB (AND PROMOTION) DUE TO MY ARREST. MIGRAINES RETURNED AFTER YEARS OF NOT HAVING THEM DUE TO STRESS. I HAD TO SEE A NEUROLOGIST AND WAS PRESCRIBED MEDICATION. I SPOKE w/ DV (DOMESTIC VIOLENCE) COUNSELORS AND OTHER INDIVIDUALS VIA VICTIM HOTLINES AND THROUGH DV Program. THIS WAS TO COPE w/ MENTAL AND EMOTIONAL TRAUMA DUE TO ARREST AND SUBJECT MATTER INVOLVING SEARCH AND ARREST; PLEASE SEE ATTACHED SHEET.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

PLEASE SEE ATTACHED SHEET

IV. Injuries: (continued)

Loud knocks (noise) or banging tend to cause anxiety and at times, panic attacks, because I'm reminded of Off. Michael Miller banging on my mother's door when he came to execute the warrant.

V. Relief:

I am asking the Court for the following requests and compensation listed below:

Qualified Immunity not to be applied with regard to any public servants or any governmental officials because a clear violation of my civil rights have been established; this negates any defense of "qualified immunity" that can be used or argued.

Disciplinary action for Off. Michael Miller, Erica Parham, Jerry Lazaroff, and any other employees (named and unnamed that participated in the violation of my civil rights). I am asking the Court to relieve them of their duties due to their misconduct and illegal activities (regarding certain defendants).

I am asking for each defendant listed in this claim to provide a written apology for their actions.

I am asking the Court for none of the defendants to have any contact with me or my family regarding harassment, stalking, threats, intimidation, etc.

I am asking that investigations, including charges filed, due to misconduct and illegal activities surrounding my rights being violated.

I am asking for more training and monitoring programs of their employees added to each institution that in which their employees violated my rights.

Regarding compensation, I am seeking twenty-five million dollars, which would include compensatory damages, loss wages, future wages, mental and emotional distress, and punitive damages, and negligence. My civil rights violation has impacted my life drastically. Due to the severity of the misconduct and civil rights violations of the defendants, I believe this compensation is warranted.

The humiliation of having others go through my personal belongings, taking my items (illegally), having others lie on me and treat me in a demeaning way so that their actions would benefit them, having to be restrained and processed, along with my character be attacked, will have a lasting affect on me. Having my reputation damaged from the stigma of the arrest and prosecution has been troubling to deal with.

Those who are public servants must be made accountable for their actions. There also needs to be transparency with the agencies, as well.

Due to repeated acts of misconduct and being treated as if I am less than human; also receiving threats, intimidation I am asking for the Court to send a strong message to those individuals/defendants that are supposed to "help and protect the public", but instead betray the trust of citizens through corruption, are not above the law.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 20th day of September, 2024.

Signature of Plaintiff 

Mailing Address 1614 Sparrow Way
Bensalem, PA 19020

Telephone Number (215) 960-8822

Fax Number (if you have one) _____

E-mail Address Siobahn.taylor@hotmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____